

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

|                      |   |                           |
|----------------------|---|---------------------------|
| <b>JOHN M. BURKE</b> | : | CHAPTER 13                |
| Debtor               | : |                           |
|                      | : | <b>No. 23-13899 (amc)</b> |

**CERTIFICATION of DEFAULT and REQUEST for ENTRY of ORDER**

I, William J. Levant, Esquire, hereby certify, under penalty of 28 U.S.C. §1746 that :

1. I am counsel for Philadelphia Federal Credit Union (“PFCU”) in the above-referenced matter.

A. On January 2, 2025, the Court entered an Order (Docket #45) approving a Stipulation resolving a Motion for Relief from the Automatic Stay that I had previously filed (Docket #36), which sought the Court’s permission for PFCU to exercise its non-bankruptcy remedies arising from the Debtor’s failure to make payment on a loan (the “**Loan**”) secured by a certain 2020 Kia Sorrento automobile, VIN XXXXXXXXXXXXXXX1509 (the “**Vehicle**”).

2. The Stipulation required the Debtor to make resume making post-petition payments “outside the plan” beginning on January 23, 2025.

3. The Debtor has paid just \$200.00 since January 23, 2025, though monthly payments of \$395.85 were due on January 23, 2025 and February 23, 2025.

4. The Stipulation further provided that, upon the Debtor’s failure to make any payment thereunder, and the passage without cure of ten calendar days from the mailing of a Notice of Default to Debtor John Burke and his counsel, PFCU could so certify to the Court, upon which an Order granting relief would issue without further hearing.

5. On February 28, 2025, I sent Notice of Default to the Debtor and to his counsel, by First Class Mail, a copy of which is attached as **Exhibit “A”**.

6. The Debtor remains in default today, and more than ten calendar days have passed

since the Notice of Default was mailed.

I therefore request entry of an Order granting the Motion in the form submitted herewith.

**KAPLIN STEWART MELOFF REITER & STEIN, P.C.**

By: /s/ William J. Levant, Esquire  
WILLIAM J. LEVANT, ESQUIRE  
910 Harvest Drive  
Post Office Box 3037  
Blue Bell, PA 19422  
(610)260-6000  
Attorneys for Philadelphia Federal Credit Union

Date: March 11, 2025

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**JOHN M. BURKE** : **CHAPTER 13**  
Debtor :  
: **No. 23-13899 (amc)**

**CERTIFICATE OF SERVICE**

I, William J. Levant, Esq., hereby certify under penalty of 28 U.S.C. §1746 that on March 11, 2025, I did send a copy of the foregoing Certification of Default via First Class Mail, postage prepaid (except as noted), to the following:

John M. Burke  
3599 Nottingham Lane, Unit "G"  
Philadelphia, PA 19114

Brad J. Sadek, Esquire (Served by ECF system)  
Debtor's counsel

Office of the U.S. Trustee (Served by ECF system)

Scott F. Waterman, Esquire (Served by ECF system)  
Chapter 13 Trustee

**KAPLIN STEWART MELOFF REITER & STEIN, P.C.**

By: /s/ William J. Levant  
WILLIAM J. LEVANT, ESQUIRE  
Attorneys for Philadelphia Federal Credit Union